

Part 70 Permit Program Update

■ *OAM has begun issuing Title Vs, FESOPs, and SSOAs*

Implementation of Indiana's Title V Operating Permit Program is underway! It has meant many hours of work for OAM staff to develop permits by rule, create model applications, take the permit process in the technology age, and review submitted applications.

Since December 1995, OAM has received more than 730 applications for Title V permits, and staff has issued completeness reviews on more than 500 of these.

Many smaller sources whose potential emissions make them subject to Title V, but whose actual emissions are significantly below the Title V threshold, opted for a lower level of permit approval. Of these, OAM has issued more than 250 Federally Enforceable Operating Permits (FESOPs), and nearly 300 Source Specific Operating Permits (SSOAs).

The Clean Air Act Amendments of 1990 required every state to set up a Title V permitting program. EPA approved Indiana's program in December 1995. The compliance deadline for all Indiana air pollution sources to submit an application for

one of the permit levels is December 13, 1996. OAM received an additional 250 FESOP applications just before the December 13, 1996 deadline.

Besides issuing permits, OAM staff has been busy establishing a permit-by-rule for sources with actual emissions of less than 20 percent of the major source threshold. These sources can voluntarily limit their potential emissions and eliminate the need for a Title V or state operating permit. These sources will need to maintain records to show that they are operating below the 20 percent permit by rule threshold.

OAM staff is also developing model Title V permits. These efforts will make the permit easier for sources to use as a compliance tool. In the model, regulatory requirements are organized by facility type and the actual emission limits are specified along with the operating parameters. Monitoring, record keeping, and reporting provisions are explained, where required. Even corrective actions for problems are addressed.

To make the permit process easier for OAM staff, IDEM

launched an innovative project with Texas Instruments to develop a computer-assisted permit review system. The technology will complete some repetitive tasks of permit review and allow the permit writers to work on source specific issues, such as compliance monitoring and operational flexibility. Staff have already tested the system on FESOP review and began using the system to review Title V applications in April.

Because federal approval of Indiana's program was delayed, thereby delaying IDEM's start-up of the program, IDEM has requested that US EPA extend the deadline for issuance of all Title V permits until December 14, 2000. In this time frame, IDEM can issue quality operating permits to all Indiana sources.

The Compliance and Technical Assistance Program (CTAP) and OAM will continue to work with sources that are not yet in the Title V operating program and who may be unsure of their status. Sources wishing to obtain confidential compliance and technical assistance can contact CTAP at (317) 232-8172 or 1-800-451-6027.

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must develop and implement a plan to reduce emissions of pollutants that contribute to those unhealthy levels. An area's progress towards cleaner air is measured by the number of exceedances of the NAAQS.

After reviewing approximately 3,000 studies completed since the ozone and particulate standards were last revised, the administrator recommended that the NAAQS for both ozone and particulate matter be

revised. The administrator also issued preliminary guidance on how states would implement these new standards and as well as how to transition from the old standards to the new.

IDEM has both developed summaries of the US EPA guidance that shows how the proposed revisions might affect Indiana and submitted comments to US EPA. If you would like copies of the

summaries or comments, you may access the documents on the World Wide Web at <http://www.ai.org/ideam/> by clicking on the button labeled Proposed O3 and Particulate Matter NAAQS.

The Web site contains all of the documents and graphs included in the print packet. You may also request print copies of the material by contacting OAM at (317) 232-8415 or (800) 451-6027 ext. 2-8415 (within Indiana).